DEPARTMENT OF THE ARMY
ST. LOUIS DISTRICT, CORPS OF ENGINEERS
ROBERT A. YOUNG BUILDING - 1222 SPRUCE ST.
ST. LOUIS, MISSOURI 63103-2833

REPLY TO ATTENTION OF: CEMVS-OC

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 20, 2014

Office of Counsel

SUBJECT: Response to Freedom of Information Act Request FA-14-0035

Mr. Edward Smith
Missouri Coalition for the Environment
3115 South Grand Boulevard
St. Louis, Missouri 63118

Dear Mr. Smith:

This correspondence comes to you in response to your Freedom of Information Act (FOIA) request dated May 16, 2014 and received by this office May 19, 2014. You have requested documents related to the 231 soil samples collected by the US Army Corps of Engineers, St. Louis District ("Corps") on haul routes between the Hazelwood Interim Storage Site (HISS) and the West Lake Landfill Superfund site as referenced by Administrator Brooks of EPA Region 7. You provided correspondence from Mr. Brooks dated May 14, 2014, to Missouri Attorney General Chris Koster.

Your request seeking documents related to 231 soil samples is broad. If you are seeking the raw data of the soil samples this is a partial no records response. The soil samples mentioned were taken by DOE in the early 1990s at which time the program was not being administered by the Corps. A diligent search was completed by Corps personnel and Corps contractor employees and the raw data was not part of the custodial documents held by the Corps.

The discussion in Mr. Brook's correspondence concerning soil samples and transportation routes from HISS to the West Lake Landfill is addressed in two pages from reports provided to the Corps from Department of Energy (DOE). These pages are from the "Remedial Investigation Report for the St. Louis Site" provided to the Corps upon transfer of this particular FUSRAP activity to the Corps. The first page 2-58, Figure 2-24 indicates where the samples were taken and, page 3-114 contains a summary describing the haul road samples. This DOE report is within our Administrative Record available to the public at two (2) locations throughout the St. Louis District. The addresses are:

0714 40502423 53
Superfund
OU-01 6/20/14

U.S. Army Corps of Engineers, St. Louis District
FUSRAP Project Office
8945 Latty Avenue
Berkeley, Missouri 63134

and,

St. Louis Public Library
Government Information Room
1302 Olive Street
St. Louis, Missouri 63103

In addition, you are seeking the disposal sites of the radioactively impacted materials that were excavated from St. Louis City and County by FUSRAP. Enclosed you will find the report "Post-Remedial Action Report for the Accessible Soils Within the St. Louis Downtown Site Plant 1 Property" REVISION 0. Page 12 of this report is enclosed indicating the two facilities used for disposal of the contaminated soils.

This is a partial denial. If you are dissatisfied with my action on this request, you may appeal from this partial denial by writing to this office. You must appeal within sixty (60) days from the date of this letter. The envelope containing the appeal should be marked with the notation, "Freedom of Information Act Appeal" and should be sent to the above address to the attention of Office of Counsel. Upon receipt, any appeal will be forwarded by this office to the Office of The Chief of Engineers in Washington, D.C., for an independent review. If you have any questions concerning the processing of this request, you may contact Ms. Kelly Bertoglio, of my staff at (314) 331-8193. Inasmuch as this responds to your request, I am closing your file in this office.

Sincerely,

William P. Leyins
District Counsel

Enclosure

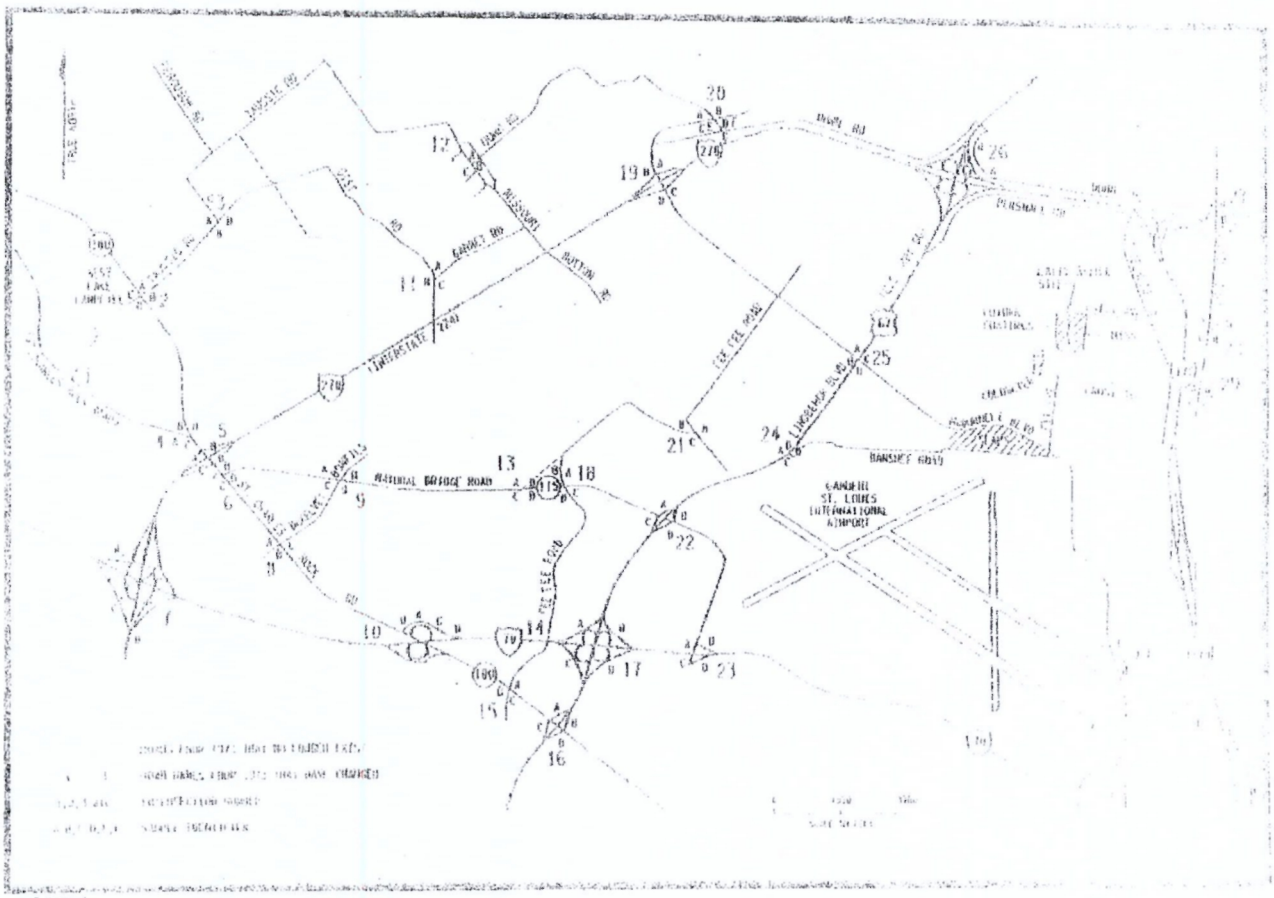

FIGURE 2-24 TRANSPORTATION ROUTES BETWEEN MISS AND WEST

3.9 CHARACTERIZATION RESULTS FOR TRANSPORTATION ROUTES BETWEEN BISS AND WEST LAKE LANDFILL AND BETWEEN SLDS AND SLAPS

Twenty-eight intersections between BISS and West Lake Landfill were sampled (Figure 2-24). A total of 231 surface soil samples were collected and analyzed for uranium-238, radium-226, thorium-232, and thorium-230; the concentrations of these radionuclides range from 1.1 to 10, 0.2 to 3.1, 0.3 to 2.2, and 0.4 to 9.9 pCi/g, respectively. Only 2 of the 231 samples exhibit thorium-230 concentrations exceeding the DOE cleanup guideline. These two sampling locations are on the western side of Intersection 28 and at Intersection 2.

Results of the survey along the suspected haul routes between SLDS and SLAPS showed no evidence of residual radioactivity related to past MED/AEC operations. Anomalies detected were attributed to road-base gravel enhanced with thorium-232, phosphate fertilizers, and emanations from SLAPS (ORNL 1991).

Mallinckrodt coal deliveries, very close coordination was necessary to efficiently schedule the competing uses for the same areas.

The nature of the materials excavated also effected the construction operations. The area of the K-Pad included about 6 feet of heterogeneous fill above the native soils, in addition to abandoned foundations and underground utilities that remained after the demolition of former buildings in the area. Excavation methods and efficiencies were adversely influenced by these subsurface features as well as other plant constraints in this limited area. These unanticipated subsurface features and other plant constraints complicated construction requirements, adding the tasks of dewatering and handling and disposal of additional construction debris, and further limiting work space availability. Since the chemical plant has been in operation since 1867, remnants from two or three generations of buildings and utilities could be expected to be encountered in most areas.

Remediation operations were also effected at Locations 3, 6, 7, and 8 adjacent to buildings where special security requirements were enforced. Work inside the fenced security areas adjacent to these buildings required advance notice to arrange for security escorts. Remediation operations at Locations 4, 5, and 11 adjacent to Building X and the Plant 2 Tank Farm were in high-plant-traffic areas, and work in these areas had to be closely coordinated to reduce the effect on plant operations. Excavations in high-traffic areas were usually subdivided so that at least one lane of the street/alley way was open to traffic at all times. As described earlier in this section; 14 original locations that include the K-Pad, locations 1 through 11, and two additional locations of contamination identified during and subsequent to the pre-design investigation activities (IT 2000a, 2000b) were subdivided and increased to 36 locations to stage construction activities to reduce adverse effects on plant operations.

Two facilities were used for disposal of the contaminated soils, as listed below.

Envirocare of Utah
Interstate 80, Exit 49
Grantsville, Utah 84029

U.S. Ecology Idaho, Inc.
(Formerly Envirosafe of Idaho)
10.5 Miles NW on Hwy 78, Lemely Rd
Grand View, ID 83624